



April 17, 2017

Todd Thompson, P.E.  
Water Use Efficiency  
California Department of Water Resources  
P.O. Box 942836  
Sacramento, CA 94236  
Via Electronic Mail: [WUE@water.ca.gov](mailto:WUE@water.ca.gov)

Dear Mr. Thompson,

Santa Rosa Water (SRW) appreciates the opportunity to comment on the Notice of Proposed Rulemaking regarding Water Loss Audits and Water Loss Control Reporting. SRW supports annual water loss audits, validation of audit data, and transparency of reporting for public access.

Regarding the text of the draft regulation, SRW has two comments. First, SRW recommends extending funding for the Water Loss Technical Assistance Program to cover technical assistance and data validation for the 2018 reporting period. The technical support provided to date has been well received and much appreciated by SRW. We anticipate the validation process for 2017 will be equally as valuable and will help ensure Santa Rosa meets the requirements fully. Otherwise, SRW will be tasked with the difficult challenge of finding and contracting with a qualified consulting firm that meets the requirements ("has conducted a minimum of 30 Level 1 audit validations in accordance with the Water Resource Foundation Standard 4639") and is not already engaged by the many other urban water providers needing to obtain data validation for 2018.

Second, the draft regulation states in 700.5 Audit Reporting Requirements (b) (4) "The following Water Loss Audit Certification Statement, signed by the chief financial officer, the chief engineer, or the general manager of an urban retail water supplier." We would ask that signature authority be extended to include "or water department director or equivalent" as cities typically have department heads that would be the appropriate signatory.

SRW has a long history of advancing water supply reliability, including annual water loss auditing and ongoing distribution system leak detection and repair. Thank you for the opportunity to provide comments on rulemaking for setting statewide standards in these areas.

If you have any questions about our comments, please contact Colin Close, Senior Water Resources Planner, at (707) 543-4524 or [CClose@srcity.org](mailto:CClose@srcity.org).

Sincerely,

BENNETT HORENSTEIN  
Director of Santa Rosa Water